

22. Please list the addresses in which you mailed correspondence and/or bills to Mr. Wilkes and/or Ms. Wilkes concerning the promissory note or the Sixth Deed of Trust. Please identify the specific time periods that you mailed such correspondence and/or bills to such addresses. Please identify any persons that have knowledge of the same.

Answer

Alisha Wilkes	Alisha Wilkes	Scott A. Weible
P.O. Box 58	18018 Densworth Mews	15000 Washington St., Suite 280
Haymarket, Virginia 20168	Gainesville, Virginia 20155	Haymarket, Virginia 20169

See documents GMAC0221 to GMAC0234 produced in response to Plaintiff's Request for Production of Documents for specific documents, time periods and parties with knowledge.

23. Please describe, in detail, the facts and circumstances concerning your efforts to obtain or review Ms. Wilkes credit report on March 11, 2008, April 1, 2008, November, 12, 2008 and February 11, 2009. Please include in your answer who authorized you to obtain or review Ms. Wilkes credit report. Also, please state your policies and procedures concerning identity theft as required by Federal Law during the aforementioned period of time. Please identify any persons that have knowledge of the same.

Answer

GMAC and Homecomings object to this interrogatory as not reasonably calculated to lead to the discovery of admissible evidence.

Preserving this objection, GMAC and Homecomings state that they cannot verify the alleged inquiries but that any credit inquiries made would have been permissible under the Fair Credit Reporting Act and pursuant to the Plaintiff's authorization. See documents GMAC0096, GMAC0102 and GMAC0110 produced in response to Plaintiff's Request for Production of Documents.

GMAC and Homecomings comply with the Privacy Policy Disclosure (see document GMAC0104 produced in response to Plaintiff's Request for Production of Documents), and they follow the procedures and comply with the Fair and Accurate Credit Transactions Act when investigating any claim of identity theft. See documents GMAC0235 to GMAC0237 produced in response to Plaintiff's Request for Production of Documents.

Plaintiff, GMAC and/or Homecomings have such knowledge.

_____(Company)

By: _____(Signature)
_____(Name)
_____(Title)


State of _____
County of _____

On this ____ day of _____, 2009, _____, personally appeared before the undersigned Notary Public, and on behalf of _____, affirmed that the foregoing Answers to Interrogatories are true and correct to the best of his/her knowledge and belief and/or based upon the information provided to him/her.

Notary Public

My Commission Expires: _____

NOLAN, MROZ & McCORMICK
130 Park St., S.E., Suite 200
Vienna, VA 22180
(703) 281-2600 - telephone
(703) 281-6238 - facsimile

By: 
Christopher C. Nolan, VSB 26043
Counsel for Defendants GMAC Mortgage, LLC
and Homecomings Financial, LLC

Certificate of Service

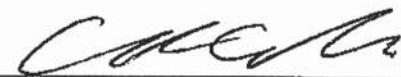
I hereby certify that a true copy of the foregoing pleading was sent by electronic mail
and mailed by first class U.S. mail, postage prepaid, this 5 day of June 2009, to:

Donna J. Hall, Esquire
SAMUEL I. WHITE, P.C.
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Virginia Beach, VA 23462

John C. Bazaz, Esquire
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Christopher C. Nolan